

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

COLLEEN SCHOENLEIN,  
*Plaintiff*

v.

STARBUCKS CORPORATION D/B/A  
STARBUCKS COFFEE COMPANY  
*Defendant*

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CIVIL ACTION NO. 4:22-cv-01399

JUDGE CHARLES ESKRIDGE

**DEFENDANT, STARBUCKS CORPORATION'S, DISCLOSURE OF EXPERT  
TESTIMONY PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 26(a)(2)**

Now comes Defendant, Starbucks Corporation, and makes the following disclosures of expert testimony pursuant to Federal Rule of Civil Procedure 26(a)(2) and this court's Scheduling Order of May 18, 2022 [D.E. 6]:

**I.**

Starbucks has not retained or specially employed any expert(s) to testify at the trial of this matter.

**II.**

While expressly reserving the right to file *Daubert* motions, question any or all of the witnesses on *voir dire* examination or otherwise challenge their credentials to offer expert testimony in this cause, Starbucks may call one or more of the following non-retained expert witnesses and/or their custodian(s) of records in their case in chief, either live or by deposition. The following have not identified by Plaintiff but are not retained by, employed by, or otherwise subject to the control of Starbucks:

Apothecary 360 Pharmacy,  
101 Southwestern Boulevard, Suite 120  
Sugar Land, Texas 77478  
(281) 915-2448

Anticipated area of testimony: Plaintiff's medical care/treatment

Buczek, Ronald, D.O.  
c/o UMMC Physicians Group, PLLC  
509 West Tidwell Street  
Houston, Texas 77091

-and-

Buczek and Kobza, PLLC  
101 Vision Park Boulevard  
Conroe Texas 77384  
(281) 973-2359

Anticipated area of testimony: Plaintiff's medical care/treatment

Buczek and Kobza, PLLC  
101 Vision Park Boulevard  
Conroe Texas 77384  
(281) 973-2359

Anticipated area of testimony: Plaintiff's medical care/treatment

Garrow, Kyle, R.N.  
c/o Heights Emergency Room  
101 North Loop, Suite 300  
Houston, Texas 77018  
(281) 560-4373

*Medical Provider for Plaintiff*

Heights Emergency Room [All Departments]  
101 North Loop, Suite 300  
Houston, Texas 77018  
(281) 560-4373

Anticipated area of testimony: Plaintiff's medical care/treatment

Ngo, Sarah, MPAS, PA-C  
c/o ProHealth Medicine  
12435 Beechnut Street, Suite 105  
Houston, Texas 77072  
(281) 501-0787

Anticipated area of testimony: Plaintiff's medical care/treatment

ProHealth Medicine  
12435 Beechnut Street, Suite 105  
Houston, Texas 77072  
(281) 501-0787

Anticipated area of testimony: Plaintiff's medical care/treatment

Radiant Dermatology & Aesthetics  
22659 Hwy 59, Suite 140  
Kingwood, Texas 77339  
(281) 973-2359

Anticipated area of testimony: Plaintiff's medical care/treatment

Sok, Rithy, M.D.  
c/o Heights Emergency Room  
101 North Loop, Suite 300  
Houston, Texas 77018  
(281) 560-4373  
Anticipated area of testimony: Plaintiff's medical care/treatment

**III.**

Starbucks reserves the right to supplement this designation with additional designations of experts within the time limits imposed by the court or any alterations of same by subsequent court order, or pursuant to the Federal Rules of Civil Procedure and/or the Federal Rules of Civil Evidence.

**IV.**

Starbucks reserves the right to elicit, by way of cross-examination, opinion testimony from any expert(s) Plaintiff may be allowed to call at the time of trial. Specifically, Starbucks expresses its intention to potentially call, as witnesses associated with adverse parties, any of Plaintiff's agents, servants, representatives or medical providers should same be necessary at the time of trial.

**V.**

Starbucks reserves the right to call undesignated rebuttal expert witnesses, whose testimony cannot reasonably be foreseen until the presentation of the evidence.

**VI.**

Starbucks reserves the right to elicit any expert opinion or lay opinion testimony at the time of trial which would be truthful, which would be of benefit to the fact finder in determining material issues of fact, and which would not be violative of any existing court Order or the Federal Rules of Civil Procedure.

**VII.**

Starbucks reserves whatever additional rights that might exist with regard to expert witnesses, pursuant to the Federal Rules of Civil Procedure, the Federal Rules of Evidence, the case law construing same, and the rulings of this court.

Respectfully submitted,

**MEHAFFYWEBER, P.C.**  
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Houston, Texas 77002  
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By:                     /s/ Gayla Corley                      
**GAYLA CORLEY**  
State Bar No. 00790505  
Southern District ID No. 20181  
**ATTORNEYS FOR DEFENDANT,**  
**STARBUCKS CORPORATION D/B/A**  
**STARBUCKS COFFEE COMPANY**

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing instrument was served via CM/ECF on the following counsel of record on this the 16<sup>th</sup> day of March, 2022 in accordance with the Federal Rules of Civil Procedure:

Mr. Andrew M. Bivona  
**BIVONA LAW PLLC**  
1415 Louisiana, 29<sup>th</sup> Floor  
Houston, Texas 77002

                    /s/ Gayla Corley                      
**GAYLA CORLEY**